REMARKS

The present application was filed on February 26, 2004 with claims 1 through 20. Claims 1 through 20 are presently pending in the above-identified patent application.

In the Office Action, the Examiner rejected claims 1-20 under 35 U.S.C. §103(a) as being unpatentable over Arnett et al. (United States Patent No. 6,078,661) in view of Laity (United States Patent No. 5,984,731).

Independent Claims 1, 8 and 14

Independent claim 1, 8 and 14 were rejected under 35 U.S.C. §103(a) as being unpatentable over Arnett et al. in view of Laity. Regarding claims 1 and 8, for example, the Examiner acknowledges that Arnett does not disclose one or more solder pads for connecting a signal line of said modem module to the carrier assembly. The Examiner asserts, however, that this feature is shown by Laity.

In one aspect of the present invention, a modem module is provided that may be attached to a motherboard and thereby eliminates the need to recertify the motherboard. Applicants note that the Examiner does not allege that Laity discloses *solder pads*. The Examiner notes, with reference to FIG. 7, that Laity teaches that the leads 42 from connector 34 being soldered to a terminal section along the forward margin.

The Examiner has not mapped the elements of Laity to the claim limitations. As best understood, the PCBA 160 corresponds to the "carrier" recited in the claims, and the connector 34 is considered by the Examiner to meet the limitations of the "modem module." The connector 34, however, does not include circuitry for interfacing with a telephone line, as required by claim 1. In addition, the leads 42 are **not** solder pads. Further, the leads 42 are not said to correspond to a signal line of a modem module.

Thus, even as combined in the manner suggested by the Examiner Arnett et al. and Laity, *do not teach every element of the independent claims.* Furthermore, based on the KSR considerations discussed hereinafter, the combination/modification suggested by the Examiner is not appropriate. Other than to allege that the combination of Arnett et al. and Laity is motivated in order to "mount and solder" various electronic components to a circuit board, the Examiner has failed to establish "an apparent reason to combine ... known elements." *KSR International Co. v. Teleflex Inc. (KSR)*, 550 U.S. ___, 82 USPQ2d 1385 (2007). Here, the Examiner merely

states that it would have been obvious in order to "mount and solder." Applicants submit that this is insufficient to satisfy the Examiner's burden of proof under *KSR*.

Thus, Arnett et al. and Laity, alone or in combination, do *not* disclose or suggest one or more solder pads for *connecting a signal line of a modem module to a carrier assembly.* Independent claims 1, 8, and 14 require one or more solder pads for connecting a *signal line of said modem module* to said carrier assembly.

Applicants respectfully request withdrawal of the rejection of independent claims 1, 8 and 14.

Dependent Claims 2-7, 9-13 and 15-20

Claims 2-7, 9-13, and 15-20 are dependent on claims 1, 8, and 14, respectively, and are therefore patentably distinguished over Arnett et al. and Laity, alone or in combination, because of their dependency from amended independent claims 1, 8, and 14 for the reasons set forth above, as well as other elements these claims add in combination to their base claim.

Conclusion

All of the pending claims following entry of the amendments, i.e., claims 1-20, are in condition for allowance and such favorable action is earnestly solicited.

If any outstanding issues remain, or if the Examiner has any further suggestions for expediting allowance of this application, the Examiner is invited to contact the undersigned at the telephone number indicated below.

The Examiner's attention to this matter is appreciated.

Respectfully submitted,

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